



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**REGION IX**  
 75 Hawthorne Street  
 San Francisco, CA 94105

September 24, 2007

VIA FEDERAL EXPRESS

Raul M. Montes, Esq.  
 Greenwald, Hoffman, Meyer & Montes, LLP  
 for Los Angeles By-Products Co.  
 500 North Brand Blvd., Suite 920  
 Glendale, CA 91203

Re: Supplemental Request for Information  
 San Fernando Valley Area 1/North Hollywood Superfund Site ("the Site")

Dear Mr. Montes:

The United States Environmental Protection Agency ("EPA") has received and reviewed Los Angeles By-Products Co.'s (the "Company") May 31, June 14, June 28, and July 26, 2006 responses to EPA's April 25, 2006 Request for Information ("Request for Information") relating to the San Fernando Valley Area 1/North Hollywood Superfund Site in North Hollywood, California. EPA appreciates the information the Company has provided to date and has a few supplemental questions as outlined below.

**Supplemental questions:**

1. **Documentation obtained by EPA indicates that, although the Company first submitted an application to operate a solid waste facility at the property now known as the Strathern Inert Landfill in August 1977 (with landfill operations to begin in 1980), the Company did not begin operating the facility as a landfill until 1992. Provide a complete description of the operations conducted at this property during the time period between the date the Company acquired the property in October 1965 until it began landfill operations in 1992. Include in the description, the identification of any tenants or lessees who operated at any portion of the property during this time period, including dates of operation and current contact information, if known.**
2. **Information supplied to EPA indicates that during the time that the Company operated the Hewitt Pit, approximately 90,000 cubic yards of an unknown material were deposited onto the property by Polich-Benedict Construction Co. when it diverted the flood channel into the Hewitt Pit. Provide complete details regarding this incident including the date, the type of material deposited onto the property (including its potential for containing PCE, TCE and/or chromium), and any cleanup, removal, or remediation actions taken as a result of the incident. Also indicate whether the area(s) where the material was deposited were subsequently tested for contamination at any point after cleanup.**

3. **Information obtained by EPA indicates that the Company may have formerly owned and/or operated property associated with the De Garmo Pit Landfill located at 11201 Randall Street, Sun Valley, California. If so, provide the dates the Company, its predecessors, subsidiaries and/or affiliates owned or operated this landfill, identify the parcels of property at which this landfill operated, the acreage of the landfill, and describe the types of operations conducted and types of waste accepted. Also provide copies of all reports related to environmental sampling conducted in soil, soil gas, and groundwater at this facility. In addition, and to the best of the Company's knowledge, explain any relationship (in terms of common ownership or operation, real property involved, overlap in time period of operations, etc.), between the De Garmo Pit Landfill (SWIS ID # 19-AR-5176) and the Community Recycling and Resource Recovery facility (SWIS ID # 19-AR-0303) which currently operates at an adjacent property.**
4. **Information obtained by EPA indicates that the Company may have formerly owned and/or operated property associated with the Victory-Vineland Landfill located at 11051 Victory Blvd., North Hollywood, California. If so, provide the dates the Company, its predecessors, subsidiaries, and/or affiliates owned or operated this landfill; identify the parcels of property at which this landfill operated and the acreage of the landfill; and describe the types of operations conducted and types of waste accepted. Also provide copies of all reports related to environmental sampling conducted in soil, soil gas, and groundwater at this facility.**
5. **Michael McAllister stated in his April 30, 1996 deposition, taken in connection with *U.S. v. Allied-Signl, Inc., et al.*, that the Newberry Landfill was formerly known as the Tujunga Landfill. The California Integrated Waste Management Board has no records for a Newberry Landfill, but does have records for a Tujunga Pit Landfill (SWIS ID # 19-AR-5165) at 8250 Tujunga Avenue.**
  - (a) **State whether the Newberry Landfill and the Tujunga Pit Landfill refer to the same landfill.**
  - (b) **If not, provide the dates the Company, its predecessors, subsidiaries, and/or affiliates owned or operated the Tujunga Pit Landfill; identify the parcels of property at which this landfill operated and the acreage of the landfill; and describe the types of operations conducted and types of waste accepted. Also provide copies of all reports related to environmental sampling conducted in soil, soil gas, and groundwater at this facility.**
  - (c) **Provide copies of historical maps which show the boundaries of landfill operations at the Newberry Landfill and/or the Tujunga Pit Landfill.**

EPA has the authority to request this information pursuant to Section 104(e) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, 42 U.S.C. Section 9604(e). Although we anticipate the Company's cooperation in this matter, please note that failure to comply with EPA's information request, or to adequately justify such failure to respond, may subject the Company to an enforcement action seeking to compel compliance and collect penalties of up to \$32,500 per day of noncompliance pursuant to Section 104 (e)(5) of CERCLA, 42 U.S.C. Section 9604(e)(5).

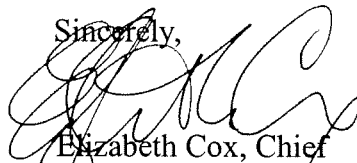
Please refer to EPA's Request for Information for definitions, defined terms, and instructions with respect to your response, including instructions as to the assertion of a business confidentiality claim and the determination of the scope of our request. Those definitions, defined terms, and instructions continue to apply and are hereby incorporated into this supplemental Request for Information. Please provide the Company's response, in writing, within thirty (30) calendar days of your receipt of this letter. The Company's response should be directed to:

Kim Muratore (SFD-7-5)  
US EPA, Region 9  
75 Hawthorne St.  
San Francisco, CA 94105

Please direct any questions you may have regarding this information request to Ms. Muratore at (415) 972-3121, or by email at [muratore.kim@epa.gov](mailto:muratore.kim@epa.gov). Please direct any technical questions with regard to the Site or cleanup activities to Rachel Loftin at (415) 972-3253, or by email at [loftin.rachel@epa.gov](mailto:loftin.rachel@epa.gov). If you have any legal questions, please address them to Michael Massey at (415) 972-3034, or by email at [Massey.Michael@epa.gov](mailto:Massey.Michael@epa.gov).

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'Elizabeth Cox', is written over the word 'Sincerely,'.

Elizabeth Cox, Chief  
Case Development/Cost Recovery Section  
Superfund Division

cc: M.R. McAllister, President  
Los Angeles By-Products Co.  
4050 Katalla Ave., Suite 209  
Los Alamitos, CA 90720



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U.S. EPA CONCURRENCES

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October 2, 2007

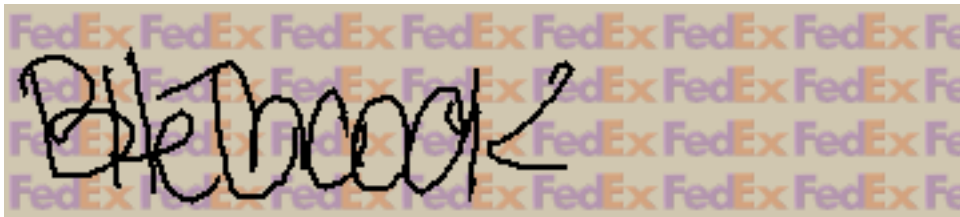
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